

LAGOMARSINO LAW  
3005 West Horizon Ridge Parkway, #241, Henderson, Nevada 89052  
Telephone (702) 383-2864 Facsimile (702) 383-0065

**THE GALLIHER LAW FIRM**

KEITH E. GALLIHER, JR, ESQ. (#220)  
1850 E. Sahara Avenue, Suite 107  
Las Vegas, Nevada 89104  
Telephone: (702) 735-0049  
Facsimile: (702) 735-0204  
[kgalliher@galliherlawfirm.com](mailto:kgalliher@galliherlawfirm.com)

**GEORGE J. KUNZ, P.C.**

GEORGE J. KUNZ, ESQ. (#12245)  
1850 E. Sahara Avenue, Suite 107  
Las Vegas, Nevada 89104  
Telephone: (702) 735-0049  
Facsimile: (702) 735-0204  
[gkunz@lvlawguy.com](mailto:gkunz@lvlawguy.com)

**LAGOMARSINO LAW**

ANDRE M. LAGOMARSINO, ESQ. (#6711)  
CRISTINA A. PHIPPS, ESQ. (#16440)  
3005 W. Horizon Ridge Pkwy., #241  
Henderson, Nevada 89052  
Telephone: (702) 383-2864  
Facsimile: (702) 383-0065  
[AML@lagomarsinolaw.com](mailto:AML@lagomarsinolaw.com)  
[Cristina@lagomarsinolaw.com](mailto:Cristina@lagomarsinolaw.com)  
*Attorneys for Plaintiff Rosen Mariano*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

ROSEN MARIANO, an individual,

Plaintiff,

vs.

THE CITY OF LAS VEGAS, a political  
subdivision of the State of Nevada;  
CORRECTIONAL HEALTHCARE  
COMPANIES, INC., a foreign corporation;  
CORRECT CARE SOLUTIONS, LLC, a  
foreign limited liability company;  
MICHELE FREEMAN, Chief of Detention  
Enforcement for the City of Las Vegas;  
CORRECTION OFFICER DOE 1-10;  
HEALTHCARE WORKER DOES 11-20;  
DOES 21-99; inclusive; ROE  
CORPORATIONS 100-199, inclusive,

Defendants.

CASE NO.: 2:18-cv-01911-APG-EJY

**STIPULATION AND ORDER TO  
RESCHEDULE THE HEARING SET FOR  
MOTIONS TO DISMISS (ECF NOS. 139 &  
140) IN COURT MINUTE ORDER  
(ECF NO. 147)**

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The parties, by and through their undersigned attorneys of record, hereby stipulate to entry of this *Stipulation and Order to Reschedule the Hearing Set for Motions to Dismiss (ECF Nos. 139 & 140) in Court Minute Order (ECF No. 147)* to an available date and time this forthcoming September. The Plaintiff's Counsel is currently scheduled for Arbitration on the date of hearing and cannot move this obligation. Additionally, for the purposes of rescheduling, counsel for the City of Las Vegas and Michelle Freeman will be out of jurisdiction from August 14, 2025 through August 25, 2025.

The parties respectfully request this Court to enter an order granting this stipulation to reschedule the Motion to Dismiss Hearing from August 13, 2025 at 10:00 a.m. to September 4, 2025 at 1:30 p.m. in Courtroom 6C.

**IT IS SO STIPULATED AND AGREED.**

DATED this 7<sup>th</sup> day of August, 2025.

**Lagomarsino Law**

/s/ Cristina A. Phipps, Esq.

ANDRE M. LAGOMARSINO, ESQ. (#6711)

CRISTINA A. PHIPPS, ESQ. (#16440)

3005 W. Horizon Ridge Pkwy., #241

Henderson, Nevada 89052

*Attorneys for Plaintiff Rosen Mariano*

**THE GALLIHER LAW FIRM**

KEITH E. GALLIHER, JR, ESQ. (#220)

1850 E. Sahara Avenue, Suite 107

Las Vegas, Nevada 89104

**GEORGE J. KUNZ, P.C.**

GEORGE J. KUNZ, ESQ. (#12245)

1850 E. Sahara Avenue, Suite 107

Las Vegas, Nevada 89104

*Attorneys for Plaintiff Rosen Mariano*

DATED this 7<sup>th</sup> day of August, 2025.

**Lewis Brisbois Bisgaard & Smith LLP**

/s/ S. Brent Vogel, Esq.

S. BRENT VOGEL, ESQ. (#6858)

6385 S. Rainbow Blvd., Suite 600

Las Vegas, Nevada 89118

*Attorneys for Defendant*

*Correct Care Solutions, LLC*

DATED this 7<sup>th</sup> day of August, 2025.

**Las Vegas City Attorney's Office**

/s/ Paul Mata, Esq.

PAUL MATA, ESQ. (#14922)

495 S. Main Street, 6th Floor

Las Vegas, Nevada 89101

*Attorneys for Defendants*

*City of Las Vegas and Michelle Freeman*

**IT IS SO ORDERED.**

By: 

**ANDREW P. GORDON**

**CHIEF UNITED STATES DISTRICT JUDGE**

**DATED: August 8, 2025**